

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05- _____
v.	:	DATE FILED: <u>May 25, 2005</u>
SANDRA BLACKMAN	:	VIOLATION:
		18 U.S.C. § 1341
	:	(mail fraud – 1 count)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

BACKGROUND

1. The People’s Light & Theatre Company (“People’s Light”) is a non-profit theater organization located in Malvern, Chester County, Pennsylvania. For the past 30 years, People’s Light has performed plays, conducted art education programs for children and adults, and maintained an active role in the performing arts community in Chester County and the surrounding region.

2. Between in or about 1983 and on or about October 21, 2004, defendant SANDRA BLACKMAN was employed by People’s Light. From in or about 1985 to in or about 1999, BLACKMAN was the business manager for People’s Light. From in or about 1999 to in or about 2004, BLACKMAN was the Director of Finance for People’s Light. As the Director of Finance, BLACKMAN was responsible for handling

the budget, auditing issues, pension funding, tax issues, maintaining bank accounts, and supervising all aspects of the financial affairs of People's Light.

THE SCHEME

3. From in or about at least 1998 through in or about at least August 2004, defendant

SANDRA BLACKMAN

devised and intended to devise a scheme to defraud People's Light of more than \$1,000,000 and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant SANDRA BLACKMAN wrote unauthorized checks from the bank account of People's Light to pay her personal expenses totaling \$861,536.16, including checks written to herself and credit card accounts with the following companies: American Express, Bank of America, BankOne, Chase, Citadel, CitiCards, Citibank, Discover, Emerge, First Card, First Union, First USA, GE Consumer Credit, MBNA, Talbot's, and Providian.

5. People's Light organized theater trips to London, England on a regular basis. Without authorization or approval, defendant SANDRA BLACKMAN had

People's Light pay for these trips on her behalf and for other persons known to the United States Attorney. The cost of these unauthorized expenses was approximately \$96,830.

6. Defendant SANDRA BLACKMAN took for her own personal use cash receipts totaling \$41,580 from People's Light that were collected from theater patrons for the purpose of development and fundraising, such as the annual AIDS fundraiser.

7. Defendant SANDRA BLACKMAN took for her own personal use cash receipts totaling \$43,640 from People's Light that were collected from box office ticket sales.

8. Defendant SANDRA BLACKMAN made unauthorized charges to her People's Light corporate credit card with American Express totaling \$48,569 to pay her personal expenses.

9. Defendant Sandra Blackman used the United States mail to mail proceeds from the scheme to pay off her debts.

10. On or about July 19, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

SANDRA BLACKMAN,

for the purpose of executing the scheme described above and attempting to do so, knowingly caused to be delivered by mail according to the directions thereon, a People's

Light check in the amount of \$16,498.09 mailed to American Express, P.O. Box 360002,
Ft. Lauderdale, Florida.

In violation of Title 18, United States Code, Section 1341.

PATRICK L. MEEHAN
United States Attorney